

**Before the  
FEDERAL COMMUNICATIONS COMMISSION  
Washington, D.C. 20554**

In the Matter of	)	
	)	
Structure and Practices of the Video Relay	)	CG Docket No. 10-51
Service Program	)	
	)	
Telecommunications Relay Services and	)	CG Docket No. 03-123
Speech-to-Speech Services for Individuals	)	
with Hearing and Speech Disabilities	)	

**REPLY COMMENTS**

**Telecommunications for the Deaf and Hard of Hearing, Inc.  
National Association of the Deaf  
Cerebral Palsy and Deaf Organization**

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Dated: September 4, 2019

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**COMMENTS**

Telecommunications for the Deaf and Hard of Hearing, Inc., National Association of the Deaf, and Cerebral Palsy and Deaf Organization (collectively “Consumer Groups”) submit these reply comments in response to the Federal Communication Commission’s (“Commission”) Further Notice of Proposed Rulemaking released on May 15, 2019.<sup>1</sup>

**A. Enterprise and Public Videophone Log-In Procedures**

The Consumer Groups continue to oppose any log-in requirements to use enterprise and public videophones as well as the proposed certification requirement for the responsible individual. The Consumer Groups agree with Sorenson that the proposed log-in requirement is “a solution in search of a problem.” Consumer Groups also agree with Convo that the proposed log-in requirement risks rendering public videophones unusable to segments of the VRS user population that need public phones the most, including children, the elderly, ASL users traveling in the US from abroad, and those with cognitive disabilities.

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<sup>1</sup> *Structure and Practices of the Video Relay Service Program; Telecommunications Relay Services and Speech-to-Speech Services for Individuals with Hearing and Speech Disabilities*, Report and Order and Further Notice of Proposed Rulemaking, FCC 19-39 (May 15, 2019) (FNPRM).

Consumer Groups oppose GlobalVRS's suggestion that visual verification of enterprise and public videophone users' identity is the most effective approach to preclude unauthorized usage. Visual verification raises similar heightened risks to consumer privacy with the additional risk of interpreters making snap judgment calls based on driver's license images. The Commission should not adopt a visual verification requirement.

The Consumer Groups also continue to recommend that the Commission refer the issue to the iTRS Advisory Council to work with the TRS Fund Administrator on less burdensome ways to validate VRS calls from public and enterprise telephones.<sup>2</sup> After the iTRS Advisory Council recommends a less burdensome way to validate such calls, Consumer Groups agree with GlobalVRS's suggestion that the Commission test, through a trial period, the impact of any log-in process on VRS users as well as the efficacy of the log-in process.

## **B. At-Home Interpreting on a Permanent Basis**

Although the Consumer Groups generally support transitioning the pilot VRS at-home call-handling program (the "Pilot Program"), some of the changes proposed by ZVRS/Purple raise concerns. ZVRS and Purple propose that the Commission should:

- Remove the three-year experience requirement for at-home CAs
- Eliminate the 30% limit on VRS minutes handled at home
- Require detailed six-month reports only from VRS providers newly providing at-home interpreting and
- Remove requirements for at-home-specific training and compliance certifications

Although Commenters are not aware that the Pilot Program negatively impacted call reliability and responses times, the Consumer Groups urge the Commission to maintain the higher standards for at-home interpreting and reporting requirements for all providers, not just newly providing at-home interpreting when making the program permanent. The Commission should continue to evaluate at-home interpreting to ensure at-home interpreted VRS calls meet the

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<sup>2</sup> Consumer Groups February 20, 2018 Ex Parte at 1, 2.

minimum standards. Consumer Groups suggest that the Commission establish a timeframe to revisit the necessity of these heightened standards at a later date, potentially one to two years after making the program permanent.

Respectfully submitted,

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